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Counsel for Defendant ANDERSON

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

CARL ANDERSON,

Defendant.

No. 24-CR-246 JD

STIPULATION AND ~~PROPOSED~~ ORDER
TO CONTINUE CHANGE-OF-PLEA
HEARING

Defendant Carl Anderson and the Government, by and through their respective counsel, stipulate and agree, with the Court's approval, that the change-of-plea hearing currently set for February 10, 2025 at 10:30 a.m. may be continued to March 3, 2025 at 10:30 a.m. The reason for the requested continuance is that additional information that bears on the plea came to light last Friday, which counsel will need to discuss with her client.

The parties also stipulate and agree that excluding time to March 3, 2025, will allow for effective preparation of counsel. 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice served by excluding the time from February 10, 2025 to March 3, 2025, outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. §§ 3161(h)(7)(A), (h)(7)(B)(iv).

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STIPULATION AND ~~PROPOSED~~ ORDER
24-CR-246 JD

1 IT IS SO STIPULATED.

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3 Dated: February 6, 2025

4 _____/s/_____
5 Tamara Crepet
6 Counsel for Defendant

7 Dated: February 6, 2025

8 ISMAIL J. RAMSEY
9 United States Attorney
10 _____/s/_____
11 Kevin Barry
12 Assistant United States Attorney

13 ~~[PROPOSED]~~ **ORDER**

14 Upon agreement and stipulation of the defendant, and the United States, and their
15 respective counsel, and good cause appearing, IT IS HEREBY ORDERED that defendant Carl
16 Anderson's hearing set for February 10, 2025 at 10:30 a.m. be continued to March 3, 2025 at
17 10:30 a.m.

18 It is also ORDERED that time may be excluded to March 3, 2025, to allow for the
19 effective preparation of counsel. The Court finds that failing to exclude time to March 3, 2025
20 would unreasonably deny counsel the reasonable time necessary for effective preparation, taking
21 into account the exercise of due diligence. *See* 18 U.S.C. §§ 3161(h)(7)(A), (h)(7)(B)(iv).

22 The Court further finds that the ends of justice served by excluding the time between
23 February 10, 2025 and March 3, 2025, outweigh the interests of the public and the defendant in
24 a speedy trial. 18 U.S.C. §§ 3161(h)(7)(A), (h)(7)(B)(iv).

25 IT IS SO ORDERED.

26 DATED: February 7, 2025

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28 _____
JAMES DONATO
United States District Judge